

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MICHAEL KAFFEE, Individually and on behalf of all others similarly situated,

Plaintiff,

V.

SONUS NETWORKS, INC., HASSAN
AHMED, PH.D. AND STEPHEN NILL,

Defendants.

Civ. Action No. 04-10345 DPW

STIPULATION AS TO ACCEPTANCE OF SERVICE AND SCHEDULING

WHEREAS, on February 12, 2004, plaintiff Michael Kaffee filed *Michael Kaffee, Individually and on behalf of all others similarly situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D. and Stephen Nill*, Civil Action No. 04-10345, DPW (D. Mass.) (the “Kaffee” Complaint”), a putative class action complaint alleging securities fraud under the Exchange Act; and

WHEREAS, Plaintiff intends to file a motion to consolidate the *Kaffee* Complaint with all other existing similar actions and later-filed similar actions,¹ and pursuant to the Private Securities Litigation Reform Act of 1995 (the “Reform Act”), intends to move for the appointment of a Lead Plaintiff and approval of the retention of Lead Plaintiff’s counsel;

¹ A current list of these existing and later-filed similar actions is attached as Exhibit A hereto.

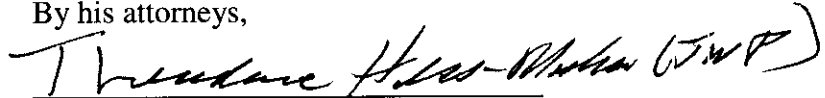
THEREFORE IT IS HEREBY STIPULATED AND AGREED by the parties
that:

1. Service of the *Kaffee* Complaint is accepted by each of the undersigned defendants, as of the date hereof or the date of personal service upon the defendants whichever is earlier;
2. Defendants need not respond to the Kaffee Complaint, but shall respond to an Amended Consolidated Complaint no later than 45 days after such Amended Consolidated Complaint is served upon Defendants by the Lead Plaintiff, to be appointed by the Court in order to consolidate the Kaffee Complaint with all other existing similar actions and later-filed similar actions in accordance with Section 21D(a)(3) of the Securities Exchange Act of 1934. In the event that the Motion to Consolidate is denied, Defendants shall respond to the Kaffee Complaint no later than 45 days after such denial;
3. In the event that any deadline herein falls on a weekend or holiday, that deadline shall be extended to following business day; and

4. After appointment of a Lead Plaintiff pursuant to the Reform Act, service on lead counsel for such plaintiff shall satisfy Defendants' service obligations.

MICHAEL KAFFEE, Individually and On
Behalf of All Others Similarly Situated,

By his attorneys,



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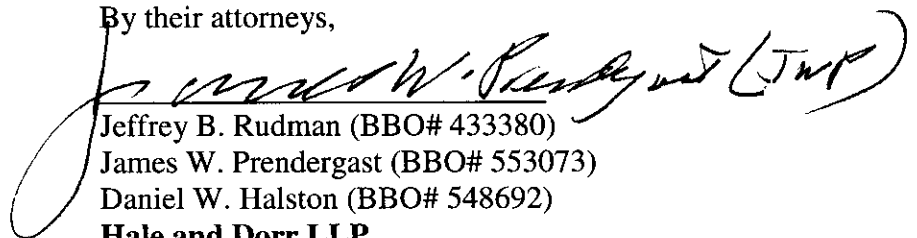
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Daniel W. Halston (BBO# 548692)

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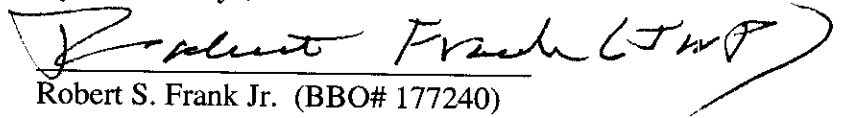
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Dated: March 18, 2004

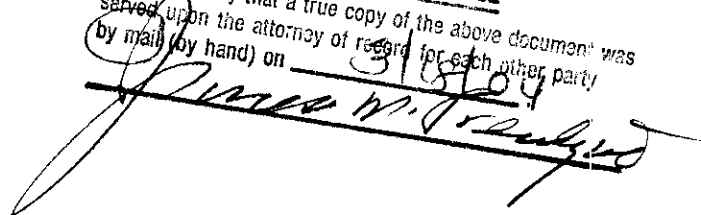
CERTIFICATE OF SERVICE
I hereby certify that a true copy of the above document was
served upon the attorney of record for each other party
by mail (by hand) on 3/18/04


EXHIBIT A

1. Deborah Chin, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10294, DPW (D. Mass.)
2. Richard Curtis, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., and Stephen Nill, C.A. No. 04-10314, MLW (D. Mass.)
3. Samantha Den, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan H. Ahmed, Stephen J. Nill, C.A. No. 04-10310, DPW (D. Mass.)
4. Peter Kaltman, On Behalf of Himself and All Others Similarly Situated v. Sonus Networks, Inc., Ruben Gruber, Hassan Ahmed and Stephen Nill, C.A. No. 04-10309, DPW (D. Mass.)
5. Information Dynamics, LLC, On Behalf of Itself and All Others Similarly Situated v. Sonus Networks, Inc., Paul R. Jones, Edward N. Harris, J. Michael O'Hara, Hassan M. Ahmed and Stephen J. Nill, CA. No. 04-10308, DPW (D. Mass.)
6. Michelle Trebitsch, On Behalf Of Herself and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10307, DPW (D. Mass.)
7. Steve L. Baker, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10332, DPW (D. Mass.)
8. Haiming Hu, Individually and On Behalf Of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10346, DPW (D. Mass.)
9. Samuel Ho, Individually and On Behalf Of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10363, DPW (D. Mass.)
10. Ronald Kassover, On Behalf of The Ronald Kassover IRA and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10329, DPW (D. Mass.)
11. Michael Kaffee, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10345, DPW (D. Mass.)

12. Wheaton Electrical Services Retirement 401K Profit Sharing Plan, On Behalf of Itself and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10383, DPW (D. Mass.)
13. Charles Starbuck, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10362, DPW (D. Mass.)
14. Robert Conte and Mark Respler, Themselves and On Behalf of All Others Similarly Situated v. Sonus, Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10382, DPW (D. Mass.)
15. Jeffrey C. Rodrigues, Individually and on Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10364, DPW (D. Mass.)
16. Brian Clark, Individually and on Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Paul R. Jones, J. Michael O'Hara, Hassan M. Ahmed and Stephen J. Nill, C.A. No. 04-10454, DPW (D. Mass.)